III. REMARKS

The Examiner is thanked for extending the courtesy of a telephone interview on April 19, 2005. During the interview the objection to claim 1 was discussed. It was agreed that if it was amended to add subparagraphing and to deleted the last "wherein", the claim would no longer be objectionable. This has been done.

Claims 1-28 are rejected under 35 USC 103(a) as being unpatentable over Shih in view of Garney.

According to the present invention and independent claims, the user interface software is divided to at least a basic module and a user interface (UI) module. In other words, both the basic module and the user interface module are part of the user interface software for an expansion card. This is an important difference from the cited references because according to the current invention a part of the UI software is already in the device before the insertion of the expansion card. This facilitates those considerable advantages as described in the application, namely, start-up is faster and still the arrangement allows informing the user of possible error situations or other situations in different languages and using a proper UI in a sensible manner upon insertion of the expansion card. The UI displayed to the user will be expansion card specific and not just general OS originated notifications.

If before a triggering event, no part of the actual UI software is loaded in the device, but said insertion triggers a more general event monitor or other loading manager to load the UI software from the expansion card, then those aforementioned

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advantages are not available. This is the case with Shih and
Garney.

In particular, according to Shih the system includes an event
monitor that detects when a Compact Flash memory card has been
inserted. Then the event monitor searches the card for an
autorun program that loads the application software from the
card. It should be noted here that according to Shih, the actual
application software is the one loaded from the card using the
autorun program. The event monitor is only arranged to search
for a suitable autorun program, and therefore the event monitor
does not contain, or form any part of, the application software.
(See Shih, for example, column 6, lines 56-66; column 7 lines
19-23; and column 7, lines 51-52). The event monitor can launch
any application software having a suitable autorun program on
the card. Based on this the applicants still submit that
according to Shih, the actual application software is loaded in
a single phase. It is clear that said software has not been
divided into two modules.

Therefore, it is respectfully submitted that the rejection by
the Examiner based on the statement that the loading and startup
of the basic module of the user interface software in the
pending claims corresponds to the event monitor in Shih cannot
be taken to be valid (see last office action page 3, first
lines). The applicants maintain that in Shih the undivided
application software is loaded in a single phase, which phase is
initiated by the autorun program. No part of that application
program exists in the memory of the device before the loading by
the autorun program is started. In other words, according to the
teachings of Shih, no part of the user interface software could
be found in the device memory before the triggering event.

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Further, the Examiner admits that Shih does not disclose that the application software would be expansion card user interface software (see page 3, lines 8-9). He also admits that Shih does not specify that the user interface software would be divided into a basic module and user interface module (see page 3, lines 13-14). The Examiner states that the combination of Shih and Garney has been presented to show the motivation to divide the expansion card software into a basic module and a UI application (see page 9, lines 10-12). On page 10, lines 9-13, the Examiner states that : "Garney is only brought in to provide the partitioning of the expansion card software into an initial phase module and a main application module, which are loaded at two different stages of Garney's process. This also signifies that the missing feature in Shih is not the two phases limitation but the dividing of the expansion card software content in two loadable portions".

As stated by the applicants in the previous response, Garney teaches how to divide a device driver program into a stub code and full device driver code. Insertion of the card triggers the loading of the stub code, and the actual device driver is driven from the memory card without transferring it into the computer memory at all.

Therefore, the combination of Shih and Garney would merely teach a person skilled in the art how, after a triggering event (insertion of a card), to either load an autorun program and then load the actual application software in one or more parts, or after the triggering event to load a stub code and then drive the rest of the application software directly from the expansion card without loading it into the device memory. Further, neither

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Shih nor Garney explicitly state that such application software could be UI software.
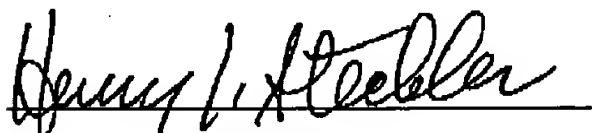
The independent claims have been amended to recite that the basic module and the user interface software are separate <u>part of the user interface software</u> of the expansion card. This is not shown in the references even when taken in combination.

Thus the rejection of claims 1-28 should be withdrawn.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.
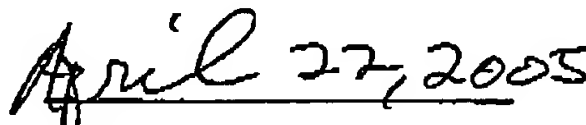
Please charge Deposit Account No. 16-1350 for a one month extension of time fee. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

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April 22, 2005
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CERTIFICATE OF FACSIMILE TRANSMISSION

I hereby certify that this correspondence is being transmitted by facsimile to (703) 872-9306 the date indicated below, addressed to the Mail Stop AF, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450

Date: _April 22, 2005_   Signature: _Shannon D'Amico_
                                              Person Making Deposit

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